

From: [William Blair](#)
To: [Bollwerk, Paul](#)
Subject: NRC: No Need For Areva
Date: Friday, July 15, 2011 8:44:45 PM

Dear Atomic Safety and Licensing Board,

NRC regulations for the implementation of the National Environmental Policy Act (NEPA) require the NRC to prepare a supplemental EIS in the event of "changed circumstances bearing on environmental concerns and bearing on the proposed action or its impacts." See 10 CFR 51.92(a). Three worldwide trends have combined to create just such changed circumstances with respect to the need for the proposed Areva uranium enrichment facility: a significant depression in the uranium market following the nuclear crisis in Japan, greatly increased cost estimates for new reactors, and a markedly reduced pace of new nuclear project construction. In light of these trends, the EIS' assertion that there is a need for the proposed Areva uranium enrichment factory -- i.e., that its environmental impacts are justified -- is not supportable. Therefore, as required by 10 C.F.R. 51.92(f)(1), the NRC must revise the EIS and publish it in draft for public comment. If the EIS is not revised and re-published, the application must be rejected.

Thank you,

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